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ATTORNEYS FOR DEFENDANT

GREYHOUND LINES, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLYDETTA SMITH

v.

GREYHOUND LINES, INC.

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:
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:
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NO.

CIVIL ACTION

NOTICE OF REMOVAL OF DEFENDANT

Defendant, Greyhound Lines, Inc., through their undersigned attorney, gives notice of the removal of the above captioned action pending in the Court of Common Pleas of Allegheny, Pennsylvania, to the United States District Court for the Western District of Pennsylvania, pursuant to 28 U.S.C. § 1332, and in support thereof aver as follows:

1. A civil action has been brought against defendant by the plaintiff in the Court of Common Pleas of Allegheny County at No. GD-17-008324. A copy of that Complaint is attached hereto as Exhibit "A".

2. The State Court where the action was originally filed is located in Allegheny County, Pennsylvania, which is embraced within this judicial district.

3. The plaintiff is, at the time of the filing of this action, a citizen of the Commonwealth of Pennsylvania.

4. Defendant, Greyhound Lines, Inc. is a Delaware Corporation with corporate headquarters located at 2221 E. Lamar Blvd., Suite 500, Arlington, Texas.

5. In her Complaint, Plaintiff alleges she suffered various serious and permanent personal injuries, serious impairment of bodily function and/ or permanent serious disfigurement and/or aggravation of pre-existing conditions and other ills and injuries, including disc bulges at L-5-S-1 and other injuries to her head, arms, legs and shoulders. As such, her action is for an amount in controversy in excess of statutory jurisdictional limit for arbitration, together with costs of this action and damages for delay.

6. A Complaint in this action was served on Defendant, Greyhound Lines Inc. A copy of the Complaint is attached as Exhibit "A". No other process, pleadings or Orders have been served upon the defendants.

7. The statutory requirements having been met, the state action is properly removed to United States District Court for the Western District of Pennsylvania.

Respectfully Submitted:

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

By: 

PAUL C. TROY, ESQUIRE

DONALD J. BELFIE, JR., ESQUIRE

Attorneys for Defendant